

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SADE COKER,

Plaintiff,

v.

**GOLDBERG & ASSOCIATES P.C., and
JULIE GOLDBERG, ESQ., an individual,**

Defendants.

Case No. 21-cv-01803-JLR

**NOTICE OF DEPOSITION
FRCP 30(b)(6) CORPORATE REPRESENTATIVE**

To: Tanner Bryce Jones, Esq.
bryce@joneslawnyc.com
Louis Lombardi, Esq.
louis@joneslawnyc.com
JONES LAW FIRM P.C.
1270 6th Ave 7th Floor
New York, NY 10020

Please take notice that Plaintiff shall take the deposition of a corporate representative of **GOLDBERG & ASSOCIATES P.C.** as defined by Fed. R. Civ. Proc. 30(b)(6) (list of topics attached hereto as Exhibit A) via remote online video technology (Zoom) contemporaneously with or immediately following the deposition of Defendant Julie Goldberg on **March 6, 2023** which is set to begin at **9:00am Eastern Time**. Should individuals other than this person be designated for any or all of the topics, counsel for Defendants shall provide the identities of such persons and the topics they will cover as soon as practicable as well as an indication of whether these designations

are likely to require a separate day of depositions; otherwise the assumption shall be that the topics can all be covered by the individual defendant.

Unless otherwise indicated in advance, you may use the following information to log in:

<https://andersondodson.zoom.us/j/84611124489?pwd=WTREalZZT1N2R3lIRW11QIVNdXRlQT09>

Meeting ID: 846 1112 4489

Passcode: 908452

THIS NOTICE NAMES AS THE DEPONENT A CORPORATE ENTITY. Under the provisions of Federal Rule of Civil Procedure 30(b)(6), the corporate Defendant is required to identify and produce for deposition one or more officers, agents, or employees to testify on its behalf on the matters specified below. It is hereby requested that prompt notification in writing be given to Plaintiffs' Counsel as to the name, capacity, and job title of the person(s) so designated to testify and matters on which the person(s) will testify.

The deponent is not limited to testifying about the matters and should be prepared to testify about any and all matters within his or her knowledge. However, **the corporate representative(s) of the company must be prepared to testify fully as to the following topics**, in the English language, which may involve reviewing documents or otherwise undertaking research in order to be able to do so. In advance of the substantive questions being posed, there must be an indication that certain (specified) topics will be addressed by a different (specified) individual deponent. Otherwise, the individual sitting for the 30(b)(6) deposition commencing will be presumed to be the sole individual speaking on behalf of the company for these purposes.

Such deposition shall be taken before a certified court reporter, and will continue until the deposition is completed. You may also obtain a transcript of said oral deposition from the court reporters upon payment of the requested transcription fee.

Dated this 26th day of February, 2023.

ANDERSONDODSON, P.C.

s/ Penn Dodson

Penn A. Dodson

penn@andersondodson.com

(212) 961-7639

11 Broadway, Suite 615

New York, NY 10004

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CERTIFICATE OF SERVICE

I hereby certify that on this Dated this 26th day of **February, 2023** I caused **Notice of Deposition of 30(b)(6) of Goldberg & Associates P.C.**, to be served by sending it to the following email address:

Tanner Bryce Jones, Esq.
bryce@joneslawnyc.com
Louis Lombardi, Esq.
louis@joneslawnyc.com
JONES LAW FIRM P.C.

ANDERSONDODSON, P.C.

s/ Penn Dodson

Penn A. Dodson

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(212) 961-7639

11 Broadway, Suite 615

New York, NY 10004

ATTACHMENT A: 30(b)(6) TOPICS

THIS NOTICE NAMES AS THE DEPONENT A CORPORATE ENTITY. Under the provisions of Rule 30(b)(6), Defendant is required to identify and produce for deposition one or more officers, agents, or employees to testify in its behalf on the following matters in the English language:

- 1) Organization and background of Goldberg & Associates P.C. generally (general history, locations, services rendered, hierarchy, job functions/positions/titles, number of employees/workers, ownership, officers/directors, investors, relationship with other corporate entities, if applicable). Includes role and functions of Lucia Rollow.
- 2) Tech platforms used in the course of business: e.g. software/apps used for
 - a) Case management
 - b) Task management
 - c) Calendars
 - d) Bookkeeping
 - e) Email
 - f) Texts
 - g) Internal communications
 - h) Phone system
 - i) Other software used on a day-to-day basis
- 3) Identity of entities with financial records
 - a) Accountant
 - b) Bookkeeper
 - c) Banks
- 4) Discovery documents:
 - a) Documents/data/information requested in Plaintiff's Requests for Production
 - b) Individuals who participated in collection of discovery documents
 - c) Process for document retrieval
 - d) Existence / availability of all data that has already been produced as PDF documents in other formats (e.g. .Excel or .csv)
 - e) Verification of Interrogatory responses
- 5) Goldberg & Associates P.C.'s standard operating procedures, expectations, rules, systems, and policies, including but not necessarily limited to the following:
 - a) Timekeeping systems, policies, and procedures generally within the company, including
 - i) Software/apps, or other tech or third party resources used for employee time tracking (including changes, if any, from 2015 to present)

- ii) Identification of ALL individuals within Goldberg & Associates P.C. who have had any responsibility for any aspects of time records processing (such as collecting or processing in time sheets, maintaining files, entering data to be transmitted to an outside entity, and handling any discrepancies or ambiguities)
 - iii) Documents pertaining to policies & procedures for time keeping related issues (e.g. internal SOP guides, employee notices or memos, etc.)
 - iv) Identification of all categories of documents pertaining to employee time tracking and/or work schedules.
- b) Payroll/compensation systems, policies, and procedures generally within the company, including
 - i) Software, payroll processing companies, or other tech or third party resources used to process payroll (including changes, if any, from 2015 to present)
 - ii) Identification of ALL individuals within BCD who have had any responsibility for any aspects of payroll processing (such as processing in time sheets, collecting receipts, maintaining files, entering data to be transmitted to an outside company, or handling any disputes or questions from employees about their paychecks) 2015-present
 - iii) Identification of any and all outside bookkeepers and/or accountants BCD has used 2015 to present (company name, individual(s) name(s), city or borough)
 - iv) Documents pertaining to policies & procedures for how payroll or compensation related issues (e.g. internal SOP guides, employee notices or memos, etc.)
 - v) Description of policies, practices and/or procedures pertaining to employee compensation and payroll, such as frequency, methods, and other similar logistics.
- c) Expense reimbursement systems, policies, and procedures generally within the company, including
 - i) Software/apps, or other tech or third party resources used for expense reimbursements (including changes, if any, from 2016 to present)
 - ii) Identification of ALL individuals within BCD who have had any responsibility for any aspects of expense reimbursement processing (such as processing in requests, collecting receipts, maintaining files, entering data to be transmitted to an outside company, handling any disputes or questions from employees etc.)
 - iii) Documents pertaining to policies & procedures for expense reimbursement related issues (e.g. internal SOP guides, employee notices or memos, etc.)
 - iv) Identification of all categories of documents pertaining to expense reimbursements
- 6) Existence of other handbooks, SOP manuals, lists of rules or expectations, memos (e.g. employee manual)
- 7) Other claims and testimony
 - a) Previous (or other) lawsuits, claims, charges, cases, or complaints brought against the Defendant by any individual related to any type of term or condition of employment (including matters relating to pay), and
 - b) Other sworn testimony of agents of BCD (deposition, in court, affidavit/declaration, etc.)

- 8) Outside Advice
 - a) any interactions between the Defendant and any state or federal DOL office or agent (excluding for the purpose of unemployment compensation).
 - b) Advice sought from any professional (tax professional, accountant, lawyer etc.) regarding payment of employees
- 9) HR issues
 - a) Hiring process
 - b) Employee Lists / people missing from the lists
- 10) Plaintiff Sade Coker
 - a) Hiring
 - b) Onboarding
 - c) Tasks Performed
 - d) Compensation
 - e) Separation